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**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

BENJAMIN GALECKI,
 a/k/a Zencense Ben,

Defendant.

Case No. 2:15-CR-285-APG-EJY
 2:20-CR-164-APG-EJY

**Unopposed Motions for Extension of
 Time to File Defendant's Response to the
 Government's Motion to Substitute and
 Forfeit Property (ECF No. 582, 2:15-CR-
 285) and (ECF No. 29, 2:20-CR-164)**

(Eleventh Request)

The United States moves this Court to extend the June 10, 2022, deadline for Benjamin Galecki's Response to the Government's Motion to Substitute and Forfeit Property by 90 days, to and including September 8, 2022. This is the eleventh request for an extension of time. LR IA 6-1 and 6-2.

The government and counsel for Galecki and Charles Burton Ritchie have been negotiating the terms of a stipulation that would address the substitution and forfeiture for numerous outcomes of this case (Forfeiture Stipulation). The government submitted its revised Forfeiture Stipulation to counsel for Galecki and Ritchie after a lengthy government review process through the United States Treasury side and the United States Department of Justice side. Counsel for the parties negotiated changes to the Forfeiture Stipulation. On May 27, 2022, the latest Forfeiture Stipulation was emailed to the Treasury side, starting the government approval process again.

1 Late afternoon on June 3, 2022, the Treasury side approved some of the defense
 2 counsel's proposed changes, made some minor changes, and rejected some of the proposals.
 3 The latest changes are with the DOJ side for approval. Without input and approval,
 4 government counsel has no authority to move forward.

5 Government counsel is unsure when the DOJ approval will be completed and has
 6 been informed the process will not start for at least a week. When DOJ completes the
 7 review and approval of the Forfeiture Stipulation, government counsel will provide the
 8 latest approved draft of the Forfeiture Stipulation to counsel for Galecki and Ritchie for
 9 their review. If counsel for Galecki and Ritchie believe it may be acceptable, they will
 10 forward it to their clients, who will decide whether it is acceptable.

11 The continued significant progress in negotiating the resolution of the motion to
 12 substitute and to forfeit, which, if successful, will negate the need for Galecki to file his
 13 Response. If the negotiations fail, Galecki will file his Response to the Government's
 14 Motion to Substitute and Forfeit Property, ECF No. 582, 2:15-CR-285, and ECF No. 29,
 15 2:20-CR-164, and requests an extension of time to file his Response.

16 Counsel does not make this request for purposes of delay but acts diligently to
 17 resolve the Motion to Substitute and to Forfeiture in an efficient manner without extended
 18 litigation and without unnecessarily taxing judicial resources.

19 Galecki and the government respectfully request a 90-day extension of Galecki's
 20 Response. Counsel for Galecki, Assistant Federal Public Defender and Appellate Chief

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Amy Cleary, and AUSA Daniel Hollingsworth advise they agreed to this 90-day extension to and including September 8, 2022.

Dated: June 7, 2022.

Respectfully submitted,

JASON M. FRIERSON
United States Attorney

/s/ Daniel D. Hollingsworth
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney

IT IS SO ORDERED:


ANDREW P. GORDON
UNITED STATES DISTRICT JUDGE

DATED: June 8, 2022